

EXHIBIT 21

RAYMOND WONG
Amro Ali vs Westchester Medical Center

October 21, 2020

1

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 AMRO ALI, M.D.,

5 PLAINTIFF,

6 -against-

Case No.: 19-CV-08324
(DLC) (DCF)

7 WESTCHESTER MEDICAL CENTER and NEW YORK
8 MEDICAL COLLEGE,

9 DEFENDANTS.

10
11 DATE: October 21, 2020

12 TIME: 11:10 A.M

13
14
15 REMOTE DEPOSITION of RAYMOND WONG,
16 taken by the Plaintiff, pursuant to a Notice
17 and to the Federal Rules of Civil Procedure,
18 held via video teleconference, before Diane
19 Buchanan, a Notary Public of the State of New
20 York.

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A P P E A R A N C E S:

ROBERT W. SADOWSKI PLLC
Attorneys for the Plaintiff
800 Third Avenue
New York, New York 10022
BY: ROBERT SADOWSKI, ESQ.

MEYER SUOZZI ENGLISH & KLEIN, P.C.
Attorneys for the Defendants
1350 Broadway
New York, New York 10018
BY: PAUL MILLUS, ESQ.

ALSO PRESENT: Amro Ali
Emily Bernstein

* * *

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F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between the counsel for the respective parties herein that the sealing, filing and certification of the within deposition be waived; that the original of the deposition may be signed and sworn to by the witness before anyone authorized to administer an oath, with the same effect as if signed before a Judge of the Court; that an unsigned copy of the deposition may be used with the same force and effect as if signed by the witness, 30 days after service of the original & 1 copy of same upon counsel for the witness.

IT IS FURTHER STIPULATED AND AGREED that all objections except as to form, are reserved to the time of trial.

* * * *

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R A Y M O N D W O N G , called as a witness,
having been first duly sworn by a Notary
Public of the State of New York, was examined
and testified as follows:

EXAMINATION BY

MR. SADOWSKI:

Q. Please state your name for the
record.

A. Raymond Wong.

Q. What is your address?

A. 1901 First Avenue, Room 6B22, New
York, New York 10020.

Q. Good morning. My name is Robert
Sadowski. I represent Dr. Amro Ali in an
action against New York Medical College and
Westchester Medical Center. I'm going to ask
you a series of questions today while you are
under oath.

Have you ever been deposed before?

A. I think many, many years ago.

Q. Okay. Let's go through the rules.
The most important rule is that you wait
until my question is finished before you
begin to speak because the court reporter

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2 cannot take down both of us speaking at the
3 same time. If you don't understand my
4 question let me know and I will rephrase it.
5 Let me know at any time you want to take a
6 break, we will do that. I just ask if
7 there's a question pending that you answer
8 the question before we take a break.

9 So Dr. Wong, what is your
10 profession?

11 A. I'm a physician.

12 Q. What kind of physician?

13 A. Ophthalmologist.

14 Q. And where do you practice
15 ophthalmology?

16 A. At Metropolitan Hospital.

17 Q. And do you hold any titles at
18 Metropolitan Hospital?

19 A. I am the chief of service for the
20 department of ophthalmology.

21 Q. And what are your duties and
22 responsibilities as chief of service?

23 A. Well, I'm the patient care and
24 administrative duties for the hospital, the
25 department and also for the residency program

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for the residents that rotate through here.

Q. What are your duties and responsibilities in connection with the residency program at Metropolitan?

A. I'm the local, I guess, program director for when the residents are here.

Q. What, if anything, is the affiliation between Metropolitan New York City Medical College and Westchester Medical Center?

A. We are affiliated with New York Medical College, but not with Westchester Medical Center?

Q. What is the affiliation with New York Medical College?

A. We are part of the ophthalmology residency program. So the residents there rotate between both sites.

Q. Are there any other residency programs that are New York Medical College?

A. I believe so. But things have changed quite a bit, so I'm not sure which ones are in recent years, but that had been the traditional model, but things have

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2 changed a bit and I'm not -- I don't
3 understand all of it.

4 Q. Okay. When did you become chief of
5 services at Metropolitan?

6 A. Say again.

7 Q. When did you become chief of
8 service at Metropolitan?

9 A. I believe it's been a while. 1992,
10 I believe.

11 Q. For some period of time were you
12 associated with New York Medical College?

13 A. Well, in a sense I've always been
14 associated with the medical college. I'm not
15 sure what, you know. So, yes, there's always
16 been an association of one sort or another
17 but, you know, it may have changed a little
18 bit over time.

19 Q. For some period of time were you
20 acting in a position at New York Medical
21 College and in the ophthalmology department?

22 A. Yes, for a few years I was the
23 interim chairman of the department.

24 Q. When did you become, what period of
25 time were you interim chairman?

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2 A. I can't -- I'm not 100 percent sure
3 of the dates. I think it was -- I can't say.
4 Maybe we started in 2015 and it lasted until
5 Dr. Hutchinson became chair. I don't know,
6 maybe 2017 it was about, about two years. I
7 can't say I'm sure of the actual dates. I
8 can look them up. It would be something like
9 that.

10 Q. Okay. And then you stopped being
11 interim chairman when Dr. Hutchinson came on
12 board; is that right?

13 A. Correct.

14 Q. Were you asked at any point to
15 become the chairman?

16 A. Yes.

17 Q. When was that?

18 A. When I started. Either 2014 or
19 2015.

20 Q. And why did you not become the
21 chairman?

22 A. Well, an interim chair is someone
23 who assumes administrative duties pretty much
24 that's all they do while there is an active
25 search for a permanent chair.

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Q. I see. And were you a candidate
for the permanent chair?

A. No. I did not apply.

Q. Did you not apply?

A. Correct.

Q. Why did you not apply?

A. I didn't think I could devote the
amount of time that a full-time chairman in
Westchester.

Q. Did you ever come to know Dr. Amro
Ali?

A. Yes.

Q. When was that?

A. I can't say when the first time
was, but it was during that time period
maybe 2015, 2016 in that time period.

Q. Okay. Let me share a document.
I'm showing you what has been marked as
Exhibit W1 it's an e-mail from Dr. Ali to you
cc Randy Hartman. Who is Randy Hartman?

A. She's my secretary.

Q. How long has she been your
secretary?

A. Also been a while. I think she

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2 started in '94. I'm thinking. I'm not
3 100 percent sure. Somewhere around that
4 time.

5 Q. Why? Do you know why Dr. Ali is
6 sending you this e-mail?

7 A. If I remember correctly I think he
8 approached us to say that he is doing this
9 type of research and whether there was an
10 opportunity, I guess, to pursue this, you
11 know, at the medical college. I think he
12 e-mailed me because at the time I was interim
13 chair, that would be my guess.

14 Q. Okay. Did you follow-up with him
15 on this proposal?

16 A. What I did was refer him to the
17 researchers at the leadership at the medical
18 college. We are not able to do this here.

19 Q. Got you. Dr. Wong, I'm showing you
20 what has been marked as Sharma W1 and W2. It
21 is an e-mail, the first e-mail in the chain
22 is from Dr. Ali to you, Dr. Wandel and Dr.
23 Sharma and it appears to be a formal
24 application PGY2 Department of Ophthalmology
25 at New York Medical College. Do you recall

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2 receiving this?

3 A. Well, I probably did. But I don't
4 recall the e-mail specifically.

5 Q. Okay. Do you understand Dr. Ali
6 was applying for a PGY2 residency program at
7 New York Medical College?

8 A. If I remember correctly, yes, I'm
9 not -- I don't really remember. Because most
10 applicants apply through the fellowship, the
11 residency match program. So I'm not sure how
12 this actually fits into that.

13 Q. Do you know of residents who join
14 outside the San Francisco match?

15 A. There were some, if we had
16 unmatched positions, I think.

17 Q. Okay. Did there come a time when
18 Dr. Ali became a faculty member at New York
19 Medical College?

20 A. I believe so. I believe that was
21 required for him to do the research.

22 Q. Right. One could not apply for
23 IRB's or grants unless they were a faculty
24 member, correct?

25 A. I believe that, that's true, yes.

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2 Q. And did you recommend Dr. Ali to
3 become a faculty member?

4 A. Yes, I think that because I was
5 interim chair a letter was needed from me but
6 it was based on the requests from I guess the
7 leadership or the staff at Westchester.

8 Q. Who do you staff at Westchester?

9 A. It would be Dr. Sharma and Dr.
10 Wandel. They were saying if he wanted to
11 pursue this he would need to be appointed to
12 a position.

13 Q. And was he appointed to a faculty
14 position on your recommendation by Dean
15 Miller?

16 A. Well, the request would have to be
17 made to him, yes.

18 Q. And you made that request?

19 A. I made that request, basically they
20 just asked me to do it.

21 Q. Okay. And the reason for that
22 request was that there was a need for Dr.
23 Ali's research in the academic institution?

24 A. Well, in general, the department
25 and the institution I think, I think could

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2 request it. It was Dr. Milo who asked that
3 the department try to pursue more academic
4 endeavors and as far as our department was
5 concerned we were also looking to do that.
6 So, it's, you know, research in general. We
7 were aware of Dr. Ali's research. He was the
8 one that contacted us. But that was a
9 general pursuit by the School of Medicine at
10 that time it was Dr. Miller that request we
11 all respond that the department do that and
12 in our case in our department we were trying
13 to accommodate him.

14 Q. Dr. Ali was brought on board to
15 fulfill the need for more academic research
16 at the institution, correct?

17 A. I believe so. I mean, yes.

18 Q. Was Dr. Ali paid for his faculty
19 position doing research?

20 A. I don't know.

21 Q. Did Dr. Ali perform research in his
22 position?

23 A. I don't know. I mean I did not --
24 you know we are located at two different
25 sites, so he spent almost the entire time at

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Westchester. I mean there were no reports to me, there was no need for reports to me or anything. I was totally unaware what was going on up there. I got a request to put him on the faculty, I wouldn't do -- I wouldn't have normally done that if I wasn't on the chair. It was an administrative function. Other than that I was not aware what he was doing.

Q. So you performed this administrative function remotely from Metropolitan Hospital?

A. Yes.

Q. How often did you go to New York Medical College?

A. Rarely.

Q. Has Dr. Hutchinson come to Metropolitan since she's been chair at WMC and New York Medical College?

A. Yes.

Q. How often?

A. Probably twice.

Q. Okay. And over what period of time is that?

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A. Since she became chair.

Q. Okay. At some point did you make some arrangements to have Dr. Ali come to Metropolitan for some purposes?

A. Yes, that was, again, a request made by the medical college at that time.

Q. Who made that request?

A. To the best of my recollection, I think it was Dr. Wandel.

Q. And why was Dr. Wandel making that request?

A. If I remember correctly he thought it would be for Dr. Ali to gather information about the program.

Q. About what program?

A. Residency program, I believe.

Q. And why did, if you know, Dr. Wandel want Dr. Ali to garner information about the residency program at Metropolitan?

A. I gather he was interested in the residency program so, you know, the residents spent almost half their time here so it would be important for him to see what that is like.

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2 Q. Did you understand that Dr. Ali was
3 joining the residency program?

4 A. No.

5 Q. Why would he be told to go to
6 Metropolitan to become familiar with the
7 residency program if he was not joining the
8 residency program?

9 A. It's like, you know, he may come
10 here and say I hate this place, I don't want
11 to join this program. It's for him to gather
12 information, you know, if he wants to -- you
13 are looking for a job, you want to go to the
14 place and see what it's like, that's nowadays
15 now everything is remote, but at that time
16 there was no pandemic, you visit the places
17 you are going to join you like it or don't
18 like it. You have to see it before you make
19 a decision.

20 Q. Did you garner an understanding
21 whether Dr. Ali liked Metropolitan program?

22 A. He didn't tell that to me one way
23 or the other. He just got assigned and he
24 left.

25 Q. How long was he there?

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2 A. I'm not sure, maybe a week. We
3 didn't really interact very much.

4 Q. With whom did he mostly interact?

5 A. I think with the residents at that
6 time.

7 Q. Did you get feedback from the
8 residents as to Dr. Ali?

9 A. Nothing specific, nothing specific.
10 Again it wasn't, you know, I mean they -- I'm
11 not sure what you mean by specific. He was
12 doing and observing what was going on. There
13 was no like active, you know, it's really
14 almost like an extended tour of the place,
15 see what the operations were like and make a
16 decision based on that.

17 Q. Did you receive any feedback from
18 anyone about how Dr. Ali liked the program at
19 Metropolitan?

20 A. No, actually.

21 Q. Did anyone at the Metropolitan have
22 an expectation that Dr. Ali was going to be
23 joining the residency program there?

24 A. No.

25 Q. There was no expectation that Dr.

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2 Ali would be joining the residency program
3 there?

4 A. I think we just were told that, you
5 know, he's going to come and observe the
6 clinic for a limited time and then I guess
7 make his decision or something. That's as
8 far as we knew. We were -- you have to know
9 that that was probably the only time we had
10 interaction. I don't know how many times he
11 was with us, but he spent 99 plus percent of
12 his time up in Westchester.

13 Q. And was it Dr. Wandel that told you
14 that Dr. Ali was coming to Metropolitan?

15 A. Yes, yes. Dr. Wandel I'm pretty
16 sure it was him because he was program
17 director at that time.

18 Q. Did you ever come to an
19 understanding that Dr. Ali was working for
20 New York Medical College as a faculty member
21 to ultimately receive a residency in
22 ophthalmology?

23 A. No.

24 Q. No one ever told you that?

25 A. No.

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Q. Did Dr. Ali ever mention that to you?

A. Well, I guess the e-mails he was interested in the program, but he would apply like everyone else. That is what I would assume. If he had a positive experience here I think he's worked at other institutions, so I guess he's trying to find if he has a positive experience at one institution he would then apply like everybody. That's done routinely at other institutions, New York Eye & Ear you do a pre-residency fellowship, you like the place, you apply. If you didn't you apply somewhere else. That's how some applicants do it.

Q. So you have no understanding that Dr. Ali was performing research and in exchange for a residency program at Westchester Medical Center?

A. No.

Q. Do you know if Dr. Ali was paid as a faculty member at New York Medical College?

A. I don't know that at all.

Q. I take it you had no discussions

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2 with Dr. Wandel about the arrangements he and
3 Dr. Ali made as he working as a faculty
4 member and obtaining a residency?

5 A. No. I mean, yes. No.

6 Q. You did not have those discussions?

7 A. No.

8 MR. MILLUS: Let's take a
9 five-minute break.

10 (Whereupon, a short recess was
11 taken.)

12 Q. I put Exhibit W16 on the screen.
13 Dr. Wong, does that bear your signature?

14 A. Yes, it does.

15 Q. And this is your request to Dean
16 Miller to bring Dr. Ali on board as a
17 full-time instructor that he's an experienced
18 researcher, he will be submitting IRB
19 proposals and that's in line with the Dean 3
20 initiatives to enhance initiatives at the
21 School of Medicine?

22 A. Yes.

23 Q. Do all applicants for the residency
24 program do a week long tour of the
25 Metropolitan facility to see if it's a fit

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2 for them?

3 A. No.

4 Q. Okay. What was different about Dr.
5 Ali doing this tour?

6 A. I'm not sure. I think that's a
7 decision that he and Dr. Wandel make.

8 Q. Is there a high volume of
9 ophthalmology patients at Metropolitan?

10 A. Yes.

11 Q. Is it a higher volume than
12 Westchester Medical Center?

13 A. Actually I don't know what their
14 volume is.

15 Q. Did you have need for experienced
16 residents at Metropolitan?

17 A. No, I mean we just, we don't expect
18 residents to be experienced.

19 Q. Okay. But residents in the
20 ophthalmology, residents in Metropolitan
21 Hospital would have the opportunity to see
22 and do procedures because of the high volume,
23 correct?

24 A. Yes.

25 Q. Dr. Wong, I'm showing you what is

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2 marked for identification as Ali 1 and W7,
3 let me just enlarge this. This is a page
4 from New York Medical College GME policy.
5 Are you familiar with the New York Medical
6 College GME policy from your time as interim
7 director?

8 A. Not specifics. The program
9 director is usually the one that is
10 responsible for that, yes.

11 Q. Do you understand that residents
12 are to take their step 3 of the United States
13 medical licensing exam at the end of their
14 second year of residency?

15 A. Well, reading this I guess that's
16 what it states.

17 Q. And there's no different
18 requirement for international medical
19 graduates, correct?

20 A. That I don't know.

21 Q. According to this policy it doesn't
22 differentiate between American and
23 international graduates, correct?

24 A. Yes, I don't see anything in here
25 that says that, yes.

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Q. Do you know if Dr. Ali had finished his level 3 or step 3 exam at the time he was at Metropolitan shadowing other residents?

A. No.

Q. You are not aware of that?

A. I don't know that, yes.

Q. Prior to Dr. Ali was there a resident in the program by the name of Star White?

A. Yes.

Q. And what happened with resident Star White?

A. She left the program early because of family issues.

Q. Was it the intention that Dr. Ali would fill her position?

MR. MILLUS: Objection as to form. Whose intention?

MR. SADOWSKI: There was an objection. Let me rephrase the question.

Q. Was it the intention of Dr. Wandel that Dr. Ali would fill Star White's position?

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2 MR. MILLUS: Objection as to form,
3 state of mind. We don't know if you
4 know what Dr. Wandel wanted to do. You
5 may testify to that.

6 Q. You can answer, Dr. Wong.

7 A. Not that I was aware of.

8 Q. Did you have discussions with
9 anyone as to who would fill Star White's
10 position?

11 A. Only general discussions. Dr.
12 Wandel indicated because it was an abrupt
13 departure, that, you know, just what is it,
14 that we needed to do to try to fill it but,
15 you know, that the filling of that position
16 is done by the program director. We spoke
17 generally we have to find someone. That's
18 pretty much it.

19 Q. Now the program director was Dr.
20 Wandel, correct?

21 A. Yes.

22 Q. So it's your understanding he would
23 have been the one to fill Star White's
24 vacancy brought about by Star White's
25 leaving?

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2 A. Correct.

3 Q. When Dr. Ali came to Metropolitan
4 did you have an understanding this was a step
5 toward Dr. Ali filling Star White's position?

6 A. No, I did not have that
7 understanding.

8 Q. Did you ever acquire that
9 understanding?

10 A. No.

11 Q. Did you ever acquire any
12 understanding why Dr. Ali did not continue
13 working at Metropolitan?

14 A. Working at Metropolitan? He only
15 came for that short time for experience.

16 Q. And do you have an understanding
17 why he didn't continue?

18 A. You mean after that one week?

19 Q. Yes.

20 A. Because he was only supposed to be
21 there for one week. Is that what you are
22 asking?

23 Q. Who told you he would be there for
24 one year?

25 A. I think there was an agreement with

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2 Dr. Wandel, Dr. Ali you come down, shadow for
3 a week and, it was his research and
4 everything was up in Westchester.

5 Q. Did you ever come to an
6 understanding that that one week of shadowing
7 was a step toward his accepting a residency
8 position where he would do rotation at
9 Metropolitan?

10 A. No.

11 Q. No one discussed that with you?

12 A. No.

13 Q. How often is it that residents do
14 -- a potential resident does a one week of
15 shadow rotation before joining the program?

16 A. So that can be answered in multiple
17 ways. For instance, medical centers at
18 New York Medical College will routinely do
19 electives there and quite a few of them have
20 been accepted into a program so they do the
21 rotation to see if they like ophthalmology,
22 the program and if they do they go through
23 the MAC program and ultimately wind up as
24 part of our residency program. There's been
25 quite a few. There's, I believe, one here

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2 now that kind of went through that. They do
3 more than a week, sometimes they do a month.

4 Q. Do you know whether Dr. Bierman --
5 are you familiar with Dr. Bierman?

6 A. I know who he is, yes.

7 Q. Do you know if he has a policy at
8 Westchester Medical Center that international
9 medical graduates must pass step 3 before
10 joining their residency program?

11 A. No. I'm not aware of that, no.

12 Q. Are you aware of that kind of
13 policy at any institution?

14 A. I'm not aware one way or the other
15 whether it's required or not required. I
16 just don't know.

17 Q. So you have no information whether
18 or not Dr. Ali was not admitted to the
19 residency program because he had not first
20 passed step 3?

21 A. No, I didn't know that. I don't
22 know anything about that. I wasn't aware of
23 anything related to that.

24 Q. Other than Mr. Millus, have you
25 spoken to anyone else about preparing for

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2 this deposition?

3 A. No. Well, our -- since the
4 subpoena was served to our risk management
5 department, but there were no details
6 exchanged. They said you got a subpoena.
7 They didn't bring it to us, our office. It
8 was at the risk management knew about it
9 first. We thought Metropolitan had been
10 involved and they said no, its not involved.
11 And they relayed the subpoena to us and
12 Mr. Millus.

13 Q. So Mr. Millus is representing you
14 at this deposition?

15 A. I believe so, yes.

16 MR. MILLUS: Actually, no. I'm not
17 the attorney for them. I am the
18 attorney for the defendant in this
19 matter. I'm not representing him in his
20 capacity as a witness. He's not my
21 client.

22 Q. Have you read the complaint that
23 was sent to Ms. Hartman in this case?

24 A. I did read it. I can't say I
25 thoroughly read it, but I kind of, you know,

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2 read through it.

3 Q. Were you aware of any of the facts
4 contained in the complaint before you read
5 it?

6 A. No.

7 Q. And you have not discussed the
8 facts of Mr. Ali's complaint with anyone; is
9 that correct?

10 A. That's correct.

11 MR. SADOWSKI: Thank you. I have
12 no further questions of Dr. Wong.

13 MR. MILLUS: Okay. We are done.

14 (Time noted: 12:15 P.M.)

15

16

17 _____
RAYMOND WONG

18

19 Subscribed and sworn to before me

20 this ____ day of _____, 2020.

21

22 _____

23

24

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RAYMOND WONG

C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF KINGS)

I, DIANE BUCHANAN, a Notary Public
within and for the State of New York, do
hereby certify:

That RAYMOND WONG, the witness
whose deposition is hereinbefore set
forth, was duly sworn by me and that
such deposition is a true record of the
testimony given by the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 31st day of October,
2020.

Diane Buchanan

DIANE BUCHANAN

RAYMOND WONG
Amro Ali vs Westchester Medical Center

October 21, 2020
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RAYMOND WONG

----- I N D E X -----

WITNESS	EXAMINATION BY	PAGE
Raymond Wong	Mr. Sadowski	4

----- INFORMATION REQUESTS -----

DIRECTIONS: None

RULINGS: None

TO BE FURNISHED: None

REQUESTS: None

MOTIONS: None

----- EXHIBITS -----

(None)

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DEPOSITION ERRATA SHEET

Our Assignment No.: J6115997

Case Caption: Amro Ali, M.D. vs. Westchester
Medical Center

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of my
Deposition taken in the captioned matter or
the same has been read to me, and the same is
true and accurate, save and except for
changes and/or corrections, if any, as
indicated by me on the DEPOSITION ERRATA
SHEET hereof, with the understanding that I
offer these changes as if still under oath.

Raymond Wong

Subscribed and sworn to on the ____ day of
_____, 20 ____ before me.

Notary Public,
in and for the State of

RAYMOND WONG
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Raymond Wong

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Raymond Wong